

Appl. No. 09/692,709  
Amdt. Dated November 17, 2004  
Reply to Office action of September 30, 2004  
Attorney Docket No. P12268/45687-00038  
EUS/J/P/04-6261

### **REMARKS/ARGUMENTS**

#### **1.) Claim Amendments**

Claim 2 has previously been cancelled. Applicant respectfully submits no new matter has been added. Accordingly, Claims 1 and 3-23 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **2.) Claim Rejections – 35 U.S.C. § 102(b)**

The Examiner rejected claims 1, 3-6, 17 and 18 under 35 U.S.C. § 102(b) as being anticipated by Merging and Extending the PGP and PEM Trust Models – The ICE-TEL Trust Model, Chadwick et al., May/June 1997 (hereinafter referred to as Chadwick).

In rejecting independent Claims 1 and 17, the Examiner stated that the Examiner disagreed with Applicant's argument that Chadwick requires a separate Certificate Authority because "Chadwick teaches (page 19, Trusted Point) that a security domain can be as small as a single user. With that said, rethinking about the independent claims and the thought that Chadwick suggests a separate Certificate Authority for each node is invalid. Each node, consisting of only a single user, does not require the use of its own Certificate Authority, because in essence, the single node is the Certificate Authority."

Applicant appreciates the Examiner's explanation, but respectfully submits that such single user situation is not applicable and certainly distinguishable from the present invention. The present invention, as clearly recited in independent Claims 1 and 17, deals with a trust group having at least two nodes. Furthermore, another node (candidate node) is further provided within the claimed ad hoc communication network to join the trust group. Accordingly, in accordance with the teachings of the present invention, the ad-hoc communication network requires at least three separate nodes communicating therein. In that regard, Applicant agrees that Chadwick discloses a single user/CA environment. Chadwick explains such a single user environment as the "I determine my own policy" environment. However, Chadwick further states that if

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there is more than one user, there is a clear distinction between the user and the CA. More specifically, Chadwick discloses:

"[t]his is one of the fundamental differences between the ICE-TEL trust mechanism and the PGP trust mechanism, in that CAs are clearly distinguished from users, and must publish their security policies before they can be trusted. In this way, a user cannot masquerade as a CA and issue certificates, without being caught." (Chadwick, pg. 19, right column, the end of first paragraph).

Accordingly, within multiple node environment, there is a clear CA role which cannot be played by a user in the Chadwick system. Chadwick clearly states that only CA is allowed to publish security policies and that a user cannot issue certificates to other users or masquerade as a CA.

In contrast, the present invention does not require such a separate certificate authority within the claimed ad hoc communication network. As further explained above, the claimed ad hoc communication network includes at least two nodes within a trust group and another candidate node desiring to join the trust group. In summary, Chadwick cannot be used to anticipate or render obvious the presently pending claims. Additionally, Chadwick similarly fails to disclose or teach other recited steps of independent Claim 1. For example, there is nothing in Chadwick that discloses the step of "identifying a node of the set of communication nodes within the trust group having a trust relationship with the candidate node." This is because a remote user in Chadwick communicates with its own "trust point (CA)" rather than trying to identify a particular node within the trust group with which it may already have a trust relationship. Such step of communicating with a trust point or CA is explained on page 20, left column of Chadwick entitled "Certificate Path." In that regard, the Examiner cited portion of Chadwick entitled "Cross Certification" also has nothing to do with the identification step recited in independent Claim 1.

Lastly, nothing in Chadwick discloses or teaches the step of "distributing trust relationship between all members in the trust group and the candidate node by means

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of the X-node distributing the public key associated with said candidate node to said all members of the trust group." The Examiner incorrectly cited page 20, right column, last paragraph as allegedly disclosing this recited step. However, Applicant respectfully submits that the cited portion of Chadwick merely states that the public key to be used by all users within the Chadwick system will "initially be distributed by some out-of-band proprietary means, and the ICE-TEL model does not manage any specific mechanism for this."

Accordingly, there is nothing in Chadwick that discloses or teaches the recited step of a X-node having a trust relationship with a candidate node distributing the public key associated with the candidate node to all members of the trust group in accordance with the teachings of the present invention.

Applicant therefore respectfully submits that independent Claims 1 and 17 are not anticipated or rendered obvious by Chadwick and are in condition for allowance.

**6.) Claim Rejections – 35 U.S.C. § 103 (a)**

The Examiner rejected claims 7-16 and 19-23 under 35 U.S.C. § 103(a) as being unpatentable over Chadwick in view of Morris et al. (US 6,691,173). Applicant respectfully submits that these claims are dependent on allowable Independent Claims 1 or 17, and recite additional limitations thereto. A Notice of Allowance for all pending claims is earnestly requested.

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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

  
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